

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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August 11, 2021

**BY ECF**

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Omar Adams,**  
**20 Cr. 655 (KPF)**

Dear Judge Failla:

I write to request that the Court temporarily modify the conditions of Mr. Adams' bail to allow him to travel with his family to Pennsylvania over Labor Day weekend. The purpose of the trip is to spend Labor Day weekend with his wife's family and to take their 11-year-old son to the Dorney Park amusement park for his birthday.

Specifically, Mr. Adams requests to leave New York on September 3 and return on September 7, 2021. They propose to stay with Mr. Adam's wife Whitney's cousin Eric Buffong in Lords Valley, Pennsylvania, and to visit Dorney Park, in Allentown, Pennsylvania, on September 5, 2021.<sup>1</sup>

Mr. Adams previously traveled to Lords Valley with his family and stayed in Mr. Buffong's home over the July 4<sup>th</sup> weekend this year, with this Court's permission. Subsequently, on July 26, the Court granted Mr. Adams' request to be placed on a curfew rather than home detention. Since that time, Mr. Adams has remained gainfully employed and compliant with Pretrial supervision.

Mr. Adams' Pretrial Services Officer, Joshua Rothman, today confirmed his compliance. Pretrial objects as a matter of policy to social-leave requests and overnight leaves from residence for defendants subject to location monitoring. The government defers to Pretrial's position. But Mr. Adams' prior successful family trip to Pennsylvania, his ongoing compliance, and the

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<sup>1</sup> Lords Valley is in the Middle District of Pennsylvania; Allentown is in the Eastern District of Pennsylvania.

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fact that Pretrial will, as always, be able to monitor his location all counsel in favor granting this request.

Respectfully submitted,

/s/  
Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

CC: AUSA Rebecca Dell  
USPSO Joshua Rothman

Application GRANTED. Mr. Adams may travel to the Middle and Eastern Districts of Pennsylvania from September 3, 2021, to September 7, 2021, subject to location monitoring by Pretrial Services.

Dated: August 12, 2021  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE